

DANA SNIEGOCKI, ESQ.
Nevada Bar No. 11715
E-mail: dsniegocki@hkm.com
HKM EMPLOYMENT ATTORNEYS LLP
101 Convention Center Drive, Suite 600
Las Vegas, NV 89109
Tel: (702) 577-3029
Fax: (702) 577-3029

ERIN S. NORGAARD, ESQ.
Washington Bar No. 32789
E-mail: enorgaard@hkm.com
HKM EMPLOYMENT ATTORNEYS LLP
600 Stewart Street, Suite 901
Seattle, WA 98101
Tel: (806) 826-5360
Fax: (806) 826-5360
Admitted Pro Hac Vice

ARTUR DAVIS, ESQ.
Alabama Bar No. 3672D-56A
Email: adavis@hkm.com
HKM EMPLOYMENT ATTORNEYS LLP
2024 3rd Avenue North, Suite 212
Birmingham, AL 35203
Tel: (404) 220-9165
Fax: (404) 220-9165
Admitted Pro Hac Vice

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DEARICA HAMBY, an Individual,

Plaintiff,

vs.

WNBA, LLC and LAS VEGAS
BASKETBALL L.P. d/b/a LAS VEGAS
ACES,

Defendants.

CASE NO.: 2:24-cv-01474-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF'S
RESPONSES TO DEFENDANTS'
MOTIONS TO DISMISS AND
DEFENDANTS' REPLIES (ECF NO. 12
& NO. 14)**

(SECOND REQUEST)

1 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-2(b), Plaintiff Dearica Hamby (“Plaintiff”),
2 Defendant WNBA, LLC, and Defendant LAS VEGAS BASKETBALL L.P. d/b/a LAS
3 VEGAS ACES (collectively “Defendants”), by and through their respective counsel of record,
4 hereby request and stipulate to an extension of time for Plaintiff to file her responses to
5 Defendants’ respective Motions to Dismiss (“Motions”) (ECF No. 12 & No. 14), which were
6 filed on September 11, 2024, and for Defendants to each file their replies in support of the
7 Motions.

8 The Court previously granted Plaintiff a two-week extension to file her responses to
9 Defendants’ pending motions and granted Defendants a one-week extension to file their
10 respective replies. ECF. No. 24. Pursuant to that order, Plaintiff’s responses to Defendants’
11 Motions are currently due October 9, 2024, and Defendants’ replies are due on October 23,
12 2024.

13 The Parties request a seven (7) day extension up to and including **October 16, 2024** for
14 Plaintiff to file her responses, and an additional seven (7) day extension up to and including
15 **October 30, 2024** for Defendants to each file their replies in support of the Motions.

16 Plaintiff requests an additional one week extension to accommodate the schedule of her
17 counsel, who are currently facing impending deadlines in other litigation matters, and one of
18 whom is scheduled for a surgical procedure the week of October 7, 2024.

19 Defendant WNBA requests a brief extension to the reply deadline to allow defense
20 counsel adequate time to review and to prepare its reply to Plaintiff’s response. Similarly, the
21 Aces request a brief extension to the reply deadline to accommodate scheduling conflicts in
22 light of Plaintiff’s extended opposition deadline. Accordingly, this request is made in good faith
23 and not for the purpose of delay.

24 This is the second request for an extension of time to extend the briefing schedule
25 regarding Defendants’ respective Motions to Dismiss.

26 Dated this 30th day of September 2024.

1 **IT IS SO STIPULATED.**

2 **HKM EMPLOYMENT ATTORNEYS LLP**

3 /s/ Dana Sniegocki

4 **Dana Sniegocki, Esq.**

5 Nevada Bar No. 11715

6 E-mail: dsniegocki@hkm.com

7 **Erin S. Norgaard, Esq.**

8 Washington Bar No. 32789 (*Admitted Pro Hac*
9 *Vice*)

10 E-mail: enorgaard@hkm.com

11 **Artur Davis, Esq.**

12 Alabama Bar No. 3672D-56A (*Admitted Pro*
13 *Hac Vice*)

14 Email: adavis@hkm.com

15 101 Convention Center Dr., Suite 600

16 Las Vegas, Nevada 89109

17 Tel: (702) 805-8340

18 Fax: (702) 805-8340

19 Attorney for Plaintiff

20 **PROSKAUER ROSE LLP**

21 /s/ Michelle A. Annese

22 Elise M. Bloom (*Admitted Pro Hac Vice*)

23 Michelle A. Annese (*Admitted Pro Hac Vice*)

24 Jordan B. Glassberg (*Admitted Pro Hac Vice*)

25 Eleven Times Square

26 New York, New York 10036-8299

27 Tel.: (212) 969-3000

28 Fax: (212) 969-2900

 ebloom@proskauer.com

 mannese@proskauer.com

 jglassberg@proskauer.com

 -- and --

 Ismail Amin, Esq. (9343)

 Marian L. Massey (14579)

 5852 S. Durango Dr., Suite 105

 Las Vegas, Nevada 89113

 TALG, NV, Ltd.

 Tel.: (702) 954-3861

HOLLAND & HART LLP

/s/ Dora V. Lane

 Gregory S. Gilbert, Esq. (6310)

 Dora V. Lane, Esq. (8424)

 Erica C. Medley, Esq. (13959)

 9555 Hillwood Drive, 2nd Floor

 Las Vegas, NV 89134

 Phone: 702.669.4600

 Fax: 702.669.4650

 gsgilbert@hollandhart.com

 dlane@hollandhart.com

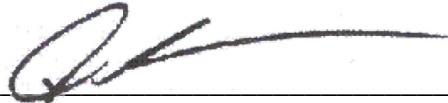
 ecmedley@hollandhart.com

 Attorneys for Defendant Las Vegas
Basketball, L.P.

1 Fax.: (949) 266-8406
2 iamin@talglaw.com
3 mmassey@talglaw.com

4 *Attorneys for Defendant WNBA, LLC*

5
6 **IT IS SO ORDERED:**

7 

8 UNITED STATES DISTRICT JUDGE

9
10 DATED: October 1, 2024